

Daniel S. Greenbaum
Commissioner

Gilbert T. Joly
Regional Director

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

Southeast Region

Lakeville Hospital, Lakeville, Massachusetts 01741

(508) 947-1231, Ext. 680-684

May 9, 1989

ME & VT WASTE
MANAGEMENT BRANCH

COPY

Kathleen J. Burns, Commissioner
City of New Bedford
Department of Public Works
133 William Street
New Bedford, Massachusetts 02740

RE: NEW BEDFORD--OIR/SA 4-127
Substations/Interceptors,
Acushnet Street, Belleville
Avenue



SDMS DocID 000200853

Dear Commissioner Burns:

The Department of Environmental Quality Engineering, Division of Hazardous Waste, has reviewed a revised scope of work for the above-referenced site. This scope of work entitled "Project Operations Plan for Grit Investigation in Main Interceptor, New Bedford, Massachusetts" dated December 1988, was prepared and submitted on your behalf by Camp Dresser and McKee (CDM) in response to Department requirements outlined in letters to the City, dated June 30, and November 1, 1988.

At this time, the Department would like to clarify that this location is a disposal site and is subject to Massachusetts General Laws, Chapter 21E, the "Massachusetts Oil and Hazardous Material Release Prevention and Response Act" and 310 CMR 40.00 the "Massachusetts Contingency Plan" (MCP). The MCP defines the purpose, scope and requisite activities in successive phases of investigation and remedial action.

The Department is of the opinion that expansion of the sampling objective is necessary. The objective outlined in CDM's Operations Plan is stated as being "To determine the degree of PCB contamination of sediments in the Interceptor as a basis for design for remedial action involving treatment, off-site disposal or encapsulation." It is our determination that the objective is too specific in that it concentrates on PCBs (polychlorinated biphenyls) as the only contaminants. As CDM states on page eighteen (18) of this plan, previous studies show that grit from the interceptor contains PCBs and various other organic and inorganic contaminants. The objective of this plan must be to determine the extent of contamination and to characterize the grit for a basis for remediation. Also, please be advised that it may be necessary to physically characterize the grit as well, as recommended by the EPA in their comments dated June 21, 1988, on CDM's original sampling protocol dated June 1, 1988. This plan does not address physical characteristic determination.

In addition, the Department is of the opinion that focusing the sampling plan on the segment of the main interceptor between Union Street and Sylvia Street is not adequate to define the extent of contamination. In a letter dated November 11, 1988, from the Department, the City was required to submit, with this revised scope of work, the results of the investigation of the main interceptor and the Belleville Avenue Collector. This investigation was proposed by the City through their Attorney, Douglas Johns, in a letter dated July 29, 1988, and approved by the Department in a letter dated November 4, 1988. This information was not submitted.

The Department cannot concur with a decision not to sample other segments of the main interceptor and the Belleville Avenue Collector due to the following reasons:

1. CDM's "Grit Study" identified accumulations of grit south of Union Street in the main interceptor to Bayview Street;
2. We cannot conclude that grit south of Union Street in the main interceptor is not contaminated with PCBs at concentrations greater than 50 ppm based on one round of samples;
3. Analyzes for PCBs only were conducted on grit accumulations with no further analyses for other contaminants;
4. Previous sampling and analyzes for PCBs were conducted approximately two (2) years ago. This is a fluid system subject to change and decisions must be based on current conditions;
5. Mr. Arthur Quaglieri, of CDM stated on January 31, 1989 that the proposed number of composite samples were not statistically derived. It is necessary to identify, through applied statistics, the appropriate number of samples for the estimated volume of grit in order that the sampling can provide a scientifically valid characterization of the grit;
6. A distance of approximately 3750 feet exists between sample number 3 (PCB less than 12.0 ppm) and sample number 4 (54.0 ppm) with approximately 2.5 feet of accumulated grit at Madison Street, (see CDM's "Grit Study");
7. EPA recommends further sampling south of Union Street in their comments dated June 21, 1988 at stations 150+00, 186+72 and 200+00;
8. Although a review of our files indicates that grit accumulated in the Howard Avenue Pumping Station had been removed in 1986, no documentation exists of clean-up in the adjacent sewer pipeline; and

9. In correspondence from CDM (on behalf of the City), to Mr. Peter Kenyon, Assistant Regional Counsel, EPA, Region I, dated December 3, 1987, it is stated that "...those sections of the interceptor that have minor grit deposits with PCB concentrations less than 50 ppm (essentially downstream of Hatfield Street) will also be cleaned" and discusses disposal of this grit at the City's landfill. A determination as to if this grit is hazardous must be made before disposal.

Therefore, the Department does not approve of CDM's Operation Plan as submitted. A revised scope of work must be submitted to the Department within forty-five (45) days of receipt of this letter that addresses the following:

1. Expansion of the sampling objective to include a determination of the degree of contamination of the grit from petroleum hydrocarbons, volatile organics, semi-volatile organics and E.P. Toxic metals. Approved analytical methods must be used. (Please note, CDM proposes the usage of the Toxicity Characteristic Leaching Procedure (TCLP) in their Operations Plan. Information received by this office from EPA, Region I and the Department's Lawrence Experiment Station concludes that this procedure is not approved by EPA at this time and is now under review. Therefore, the Department does not approve the usage of this method for this project.);
2. Expansion of the inspection and sampling of the main interceptor south of Union Street to, at a minimum, Bayview Street and of the Belleville Avenue Collector north of Sylvia Street;
3. The Department approves of sampling of the twenty-nine (29) manholes along the main interceptor between Union Street and Collette Street and the sampling of the grit in eighteen (18) inch segments. However, the Department is of the opinion that the number of composite samples proposed, (six) cannot sufficiently characterize the grit and will not provide enough information to adequately define the extent of contamination in the main interceptor and the Belleville Avenue Collector. Identify the appropriate number of samples for the estimated volume of grit using applied statistics that will provide a scientifically valid characterization;
4. Develop a risk characterization and evaluation in accordance with 310 CMR 40.545(3)(c)(d) and (g) through (i); and
5. A schedule for implementation for actions.

In addition, provide the following information with the revised scope of work:

1. Sample collection and analysis reports for samples one (1) through seven (7) and the sample from the grit chamber from CDM's "Grit Study" (see enclosure for minimum standards for the submission of laboratory data); and

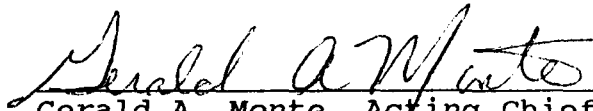
2. Results of the previous studies cited on page eighteen (18) of the Operations Plan that identified various organic and inorganic contaminants.

The Department requires written confirmation that the City of New Bedford will undertake the actions outlined above within fifteen (15) business days of receipt of this letter.

The Department is prepared to meet with you and your consultant to discuss the requirements of this letter on May 23, 1989 at 10:00 a.m., at the Department of Environmental Quality Engineering, Southeast Regional Office, Lakeville Hospital, Lakeville, Massachusetts. Please notify the Department as to whether you and your consultant will attend this meeting.

Please refer your response and any questions to the attention of Debra Kelley-Dominick of this office referring to file number OIR/SA 4-127.

Very truly yours,


Gerald A. Monte, Acting Chief
Site Assessment Section

M/DKD/re

Enclosure

CERTIFIED MAIL #P 904 977 851
RETURN RECEIPT REQUESTED

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